



FEDERAL ELECTION COMMISSION

RQ-3

WASHINGTON, D.C. 20463

June 30, 1994

Robert C. Brannon, Treasurer
Tennessee Republican Party Federal
Election Account Victory '92
P.O. Box 150368
Nashville, TN 37215

Identification Number: C00040220

Reference: April Quarterly Report (1/1/94-3/31/94)

Dear Mr. Brannon:

This letter is to inform you that as of June 29, 1994, the Commission has not received your response to our request for additional information, dated June 8, 1994. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Jan McBride on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson", is written over the typed name.

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

Robert C. Brannon, Treasurer
Tennessee Republican Party Federal
Election Account Victory '92
P.O. Box 150368
Nashville, TN 37215

JUN 8 1994

Identification Number: C00040220

Reference: April Quarterly Report (1/1/94-3/31/94)

Dear Mr. Brannon:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11(a)(i) of the Detailed Summary Page of your report discloses a total of \$88,475 in contributions from individuals. The sum of the entries itemized on Schedule A, however, indicates the total to be \$80,235. Please amend your report to clarify the discrepancy.

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the

TENNESSEE REPUBLICAN PARTY FEDERAL
ELECTION ACCOUNT VICTORY '92
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extent that your committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR §103.3(b). The Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B of your report to clarify the following descriptions: expenses, office expenses. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Please clarify all expenditures made for direct mail expenses on Schedule B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B or F supporting Line 23 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §104.3(b)

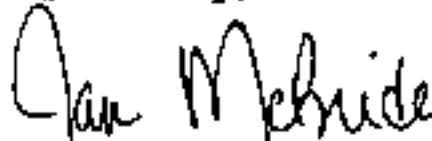
-Schedule A supporting Line 15 of the Detailed Summary Page discloses \$23,226.36 in offsets to operating expenditures. Please amend your report to further clarify the purpose of these receipts.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on

TENNESSEE REPUBLICAN PARTY FEDERAL
ELECTION ACCOUNT VICTORY '92
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our toll-free number, (800) 424-9530. My local number is (202)
219-3580.

Sincerely,



Jan McBride
Reports Analyst
Reports Analysis Division

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SCHEDULE A

ITEMIZED RECEIPTS

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
Tennessee Republican Party Federal Election Account Victory '94

11c

A. Full Name, Mailing Address and ZIP Code Nations Bank of Tennessee PAC One Nations Bank Plaza Nashville, TN 37239	Name of Employer	Date (month, day, year) 03/02/94	Amount of Each Receipt this Period \$1,500.00
	Occupation		
Receipt For: Federal	Aggregate Year-to-Date >		\$1,500.00
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For:	Aggregate Year-to-Date >		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For:	Aggregate Year-to-Date >		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For:	Aggregate Year-to-Date >		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For:	Aggregate Year-to-Date >		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For:	Aggregate Year-to-Date >		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation		
Receipt For:	Aggregate Year-to-Date >		

SUBTOTAL of Receipts This Page (optional)	\$1,500.00
TOTAL This Period (last page this line number only)	\$1,500.00

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